June 23, 1998

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CALFED BAY-DELTA PROGRAM 1416 Ninth Street, Suite 1155 Sacramento, CA 95236-0001

Attention: Rick Breitenbach

SUBJECT: COMMENTS ON THE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT, MARCH 1998

Dear Mr. Breitenbach,

I am writing on behalf of the four local mosquito and vector control districts (districts) located in the Delta Region to submit comments on the Programmatic Environmental Impact Statement/Environmental Impact Report (DEIR) for the CALFED program. We are submitting these advisory comments based on the district's local mandate to provide for the public's health and well being through comprehensive vector control.

The districts primary concerns are based on the proposed development of wetlands as part of the Ecosystem Restoration Program Plan (ERPP). Following are issues that need to be addressed before certification of a final EIS/EIR:

- 1. Best Management Practices (BMP) for wetland management must be developed and adopted to prevent mosquitoes <u>before</u> creation of wetlands. The districts and the University of California Mosquito Research Program are available to assist in this matter.
- 2. Acquisition and retirement of privately owned land for ERPP wetland development must not compromise district funding. The activities of vector surveillance and control will intensify with the development of wetlands, necessitating a firm revenue base for current and future district operations.
- 3. Wetlands developed per the ERPP must be managed with adequate resources in perpetuity. Wetland management and maintenance funds must include adequate monies for ongoing vector surveillance and control for reimbursement to districts for services rendered.
- 4. The final EIS/EIR should provide adequate mitigation measures to address the unavoidable impacts as described in Section 8.8.2.7, page 8.8-13 of the draft. Again, the districts and the University of California are available to assist in this area.

The districts look forward to working with CALFED staff to develop effective measures to mitigate these issues.

Sincerely,

John R. Stroh

Manager

San Joaquin County Mosquito & Vector Control District 7759 South Airport Way, Stockton, CA 95206-3918 (209) 982-4675

cc:

Contra Costa Mosquito & Vector Control District Charles Beesley, Ph.D., Manager (925) 685-9301 155 Mason Circle, Concord, CA 94520

Sacramento-Yolo Mosquito & Vector Control District David Brown, Manager (916) 685-0122 8631 Bond Road, Elk Grove, CA 95624

Solano County Mosquito Abatement District Dennis D. Beebe, Manager (707) 437-1116 2950 Industrial Court, Fairfield, CA 94533

SAN JOAQUIN COUNTY MOSQUITO & VECTOR CONTROL DISTRICT

7759 SOUTH AIRPORT WAY STOCKTON, CALIFORNIA 95206-3918







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